

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
SALLIEU MANSARAY	:	VIOLATIONS:
	:	18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D), and 2
	:	(dealing in firearms without a license – 1
	:	count)
	:	18 U.S.C. § 924(a)(1)(A) (making false
	:	statements to a federal firearms licensee – 7
	:	counts)
	:	18 U.S.C § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about November 24, 2020, to on or about August 18, 2021, in the Eastern District of Pennsylvania, defendant

SALLIEU MANSARAY

and Person 1, a person known to the grand jury, willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), and 2.

COUNTS TWO THROUGH EIGHT

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Dusty Rhoads Police Supply, located at 225 East Winona Avenue in Norwood, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
2. King Shooters Supply, located at 346 East Church Road in King of Prussia, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
3. Firing Line, Inc., located at 1532 South Front Street in Philadelphia, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
4. S.C. Guns, located at 302 Bustleton Pike in Feasterville, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
5. Treeline Sports, Inc., located at 1447 West Main Street in Norristown, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
6. Miller’s Sporting Goods, located at 1576B Chichester Avenue in Linwood, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
7. FFL holders are licensed, among other things, to sell firearms. Various

rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.

8. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The Form 4473 contains the following language in bold type: **"Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you."** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete," and acknowledge by his or her signature that "making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law."

9. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

10. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a "straw purchaser."

11. On or about the dates listed below, in Norwood, King of Prussia, Philadelphia, Feasterville, Norristown, and Linwood, each in the Eastern District of Pennsylvania, defendant

SALLIEU MANSARAY,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders' records, in that defendant MANSARAY, certified on the Form 4473 that he was the actual transferee/buyer, when in fact, as defendant knew, this statement was false and fictitious, because MANSARAY was purchasing the firearms on behalf of Person 1, a person known to the grand jury, each date constituting a separate offense:

Count	Date and FFL Location	Firearm	Serial Number
Two	November 24, 2020 Dusty Rhoads Police Supply 225 East Winona Avenue Norwood, Pennsylvania	SMZ, SAR9, 9mm pistol	T1102- 20BV02414
Three	July 8, 2021 King Shooters Supply 346 East Church Road King of Prussia, Pennsylvania	Taurus, G3, 9mm pistol	ACE964043
Four	July 12, 2021 Firing Line, Inc. 1532 South Front Street Philadelphia, Pennsylvania	Smith & Wesson, M&P 40, .40 caliber pistol	MPN7638

Five	July 13, 2021 S. C. Guns 302 Bustleton Pike Feasterville, Pennsylvania	Glock, model 22, .40 caliber pistol	SFL758
Six	August 6, 2021 Treeline Sports Inc. 1447 West Main Street Norristown, Pennsylvania	Taurus, G2C, 9mm pistol	ACG990105
Seven	August 17, 2021 King Shooters Supply 346 East Church Road King of Prussia, Pennsylvania	Smith & Wesson, M&P 9 Shield, 9mm pistol	JML7540
Eight	August 18, 2021 Miller's Sporting Goods 1576B Chichester Avenue Linwood, Pennsylvania	Smith & Wesson, M&P 380 Shield, .380 caliber pistol	RDX5627

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(A) set forth in this indictment, defendant

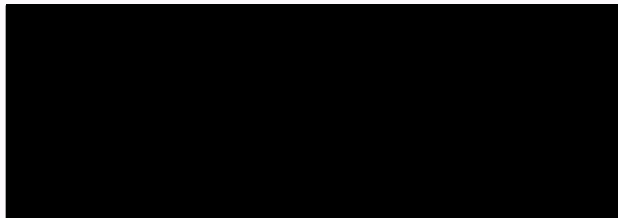
SALLIEU MANSARAY

shall forfeit to the United States of America, the firearms involved in the commission of such violations, including, but not limited to:

- 1) a SMZ, model SAR9, 9mm pistol, bearing serial number T1102-20BV02414;
- 2) a Taurus, model G3, 9mm pistol, bearing serial number ACE964043;
- 3) a Smith & Wesson, M&P 40, .40 caliber pistol, bearing serial number MPN7638;
- 4) a Glock, model 22, .40 caliber pistol, bearing serial number SFL758;
- 5) a Taurus, model G2C, 9mm pistol, bearing serial number ACG990105;
- 6) a Smith & Wesson, M&P 9 Shield, 9mm pistol, bearing serial number JML7540; and
- 7) a Smith & Wesson, M&P 380 Shield, .380 caliber pistol, bearing serial number RDX5627.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

A TRUE BILL:



A handwritten signature in blue ink, appearing to read "JCR" followed by a flourish and the word "for".

JACQUELINE C. ROMERO
United States Attorney

No. 23 _____

UNITED STATES DISTRICT COURT
Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA
vs.

SALLIEU MANSARAY

INDICTMENT

**18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D), and 2 (dealing in firearms without
a license – 1 count)**

**18 U.S.C. § 924(a)(1)(A) (making false statements to a federal firearms
licensee – 7 counts)**

18 U.S.C § 2 (aiding and abetting)

Notice of forfeiture

Filed in open court this 28th day,
Of March A.D. 20 23

Clerk

Bail, \$ _____
